

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOSEPH JACKSON,	)	
	)	18 CV 3007 (JS) (AKT)
Plaintiff,	)	
	)	
-against-	)	
	)	
NASSAU COUNTY, et al.	)	
	)	
Defendants.	)	

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PLAINTIFF'S SECOND DEMAND TO VILLAGE OF FREEPORT  
FOR VERIFIED INTERROGATORY RESPONSES

Pursuant to Rules 26.3, 26.4 and 26.5 of the Local Rules of the United States District Court for the Eastern District of New York (the "Local Rules") and Rules 30(b)(6) and 33 of the Federal Rules of Civil Procedure, plaintiff requests that defendant Village of Freeport answer, under oath, within thirty days, the following interrogatories.

Alongside the Local Rules, these requests are to be construed in accordance with the Elefterakis, Elefterakis & Panek Uniform Definitions and Instructions for Interrogatories and Discovery Demands dated November 28, 2018, available at <https://bit.ly/2Xc76mR>. In the event that you fail to respond without reasonable grounds, plaintiff reserves the right to petition the Court to overrule any objection, compel a response and award expenses incurred in connection with the motion.

10. Identify, as of March 1994, the Village of Freeport employee(s) assigned to following positions at the Freeport Police Department: a) Watch Commanders/Lieutenants; b) Detective Lieutenant; c) Deputy Chief; d) Assistant Chief; and e) Chief of Police.

Dated: March 5, 2020  
New York, New York

ELEFTERAKIS, ELEFTERAKIS & PANEK



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